

UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF NEW HAMPSHIRE

IMS HEALTH INCORPORATED, a Delaware )  
corporation and VERISPAN, LLC, a Delaware )  
limited liability company, )

Plaintiffs, )

vs. )

KELLY A. AYOTTE, as Attorney General of )  
the State of New Hampshire, )

Defendant )

Case No. 06-CV-280-PB

**STATE'S WITNESS LIST**

NOW COMES the State of New Hampshire (the "State"), by and through the Office of  
the Attorney General, and respectfully submits the following Witness List for trial in the above  
referenced matter.

1. Dr. Jerry Avorn  
Professor of Medicine, Harvard Medical School  
Chief, Division of Pharmacoepidemiology and Pharmacoeconomics  
Brigham and Women's Hospital  
1620 Tremont Street, Suite 3030  
Boston, MA 02120  
(617) 278-0930
2. Dr. Aaron S. Kesselheim  
Division of Pharmacoepidemiology and Pharmacoeconomics  
Brigham and Women's Hospital  
1620 Tremont St., Suite 3030  
Boston MA 02115  
(617) 278-0930
3. Dr. Gary A. Sobelson  
Concord Family Medicine  
141 East Side Drive  
Concord, NH. 03301  
(603) 225-3427

4. Dr. Marc Sadowsky  
New England Neurological Associates  
Medical Arts Building  
168 Kinsley Street, Suite #1  
Nashua, NH 03061  
(603) 882-2114
5. Shahram Ahari  
1524 Berkeley Way, Apt A  
Berkeley, CA 94703  
cell: (510) 684-8509
6. The Defendant reserves the right to present testimony, by reference to deposition transcripts or portions of deposition video, or to call any witness listed by the Plaintiffs.
7. The Defendant reserves the right to call rebuttal or impeachment witnesses not listed or identified herein as necessary and as allowed by the Court, depending on the evidence allowed at trial.
8. In accordance with the Discovery Plan (Court document No. 34), and the Order approving the Discovery Plan, the Defendant designates the declarations and depositions described in its Exhibit List, filed concurrently with this Witness List.

All parties have submitted witness declarations to the Court. The video depositions of all of the State's witnesses and many of the Plaintiffs' witnesses have been taken. The State's position is that all witnesses for both parties can be submitted by declaration, deposition transcript and video, with relevant portions to be presented in argument to the Court.

Respectfully submitted,

THE STATE OF NEW HAMPSHIRE  
Kelly A. Ayotte  
Attorney General

Date: 12/22/2006

By: /s/Richard W. Head  
Richard W. Head (N.H. Bar No. 7900)  
Senior Assistant Attorney General

David A. Rienzo (N.H. Bar No. 13860)  
Assistant Attorney General

Laura E. B. Lombardi (N.H. Bar No. 12821)  
Assistant Attorney General

33 Capitol Street  
Concord, New Hampshire 03301  
(603) 271-3643

**Certification of Service**

I hereby certify that a copy of the foregoing document was filed electronically and served electronically by operation of the Court's electronic filing system or by mail on anyone unable to accept electronic filing. Jeffrey C. Spear, Esquire, James Bassett, Esquire, Patricia Acosta, Esquire and Thomas R. Julin, Esquire have appeared as counsel of record for plaintiffs IMS Health Incorporated and Verispan, LLC.

By: /s/Richard W. Head  
Richard W. Head (N.H. Bar No. 7900)